

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
Nashville Division

DO NO HARM

Case No. 3:34-cv-01334

v.

WILLIAM LEE, in his official capacity as Governor
of the State of Tennessee.

Judge Aleta A. Trauger

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Rule 83.01 of the Local Rules of Court for the United States District Court
Middle District of Tennessee, Caleb R. Trotter hereby moves for admission to appear
pro hac vice in the above-captioned action as counsel for Plaintiff Do No Harm .

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the following
is true and correct:

1. I am a member in good standing of the following United States District Court or
United States appellate court: Central District of California

Attached is a Certificate of Good Standing from that court.

2. I am not, nor have I ever been, the subject of disciplinary proceedings by any
disciplinary authority, court, or tribunal, except as provided below:

3. I have not been found in contempt by any court or tribunal, except as provided
below:

4. I have not been sanctioned pursuant to 28 U.S.C. § 1927, except as provided
below:

5. I have never been censured, suspended, disbarred, or denied admission or readmission by any court or tribunal, except as provided below.

6. I have not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below:

7. I understand that pursuant to Local Rule 83.01(d)(1), if I am not both a member of the Tennessee bar and admitted to the bar of this Court, local counsel must be retained. Below is the name, address, phone number, and e-mail address of local counsel retained in this matter:

Daniel J. Turklay (#034600),
Turklay Law, 115 E Main Street
Lebanon, TN 37087
(615) 838-5903, daniel@turklaylaw.com

8. I have read and am familiar with Local Rules of Court for the United States District Court Middle District of Tennessee.

9. By seeking admission to practice before this Court, I acknowledge my responsibility for compliance with all rules of this Court and confer disciplinary jurisdiction upon this Court for any alleged misconduct arising in the course of the proceeding.

Caleb R. Trotter
/s/

Signature

Name: Caleb R. Trotter

State where admitted and State Bar Number: California, 305195

Business Address: 555 Capitol Mall, Suite 1290, Sacramento, CA 95814

Local Address [if different from above]:

Phone: (916) 419-7111

Email: CTrotter@pacificlegal.org

CERTIFICATE OF SERVICE

[Include certificate of service in compliance with Local Rule 5.01 and 5.02]

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. Notice of this filing will be served upon the Defendant via hand delivery to the following:

Tennessee Attorney General's Office
Jonathan Skrmetti, Tennessee Attorney General
P.O. Box 20207
Nashville, TN 37202

DATED: November 16, 2024

/s/ Daniel J. Turklay

**FEE: \$150.00 [Fee may be paid through the credit card module in ECF or payment may be forwarded to the Clerk within 21 days of filing the motion. If forwarded to the Clerk, payment should be in the form of a check, cashier's check or money order payable to the Clerk, U.S. District Court, 719 Church Street, Suite 1300, Nashville, TN 37203.]

Attorneys with CM/ECF filing privileges in this Court may file Motions for Admission *Pro Hac Vice* via CM/ECF. For movants who do not yet have CM/ECF filing privileges, local counsel may file Motions for Admission *Pro Hac Vice* on their behalf. Additionally, counsel may file the Motion phv@tnmd.uscourts.gov.